

Federal Defenders OF NEW YORK, INC.

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U.S. DISTRICT COURT E.D.N.Y.

★ JUL 25 2006 ★

July 13, 2006

BROOKLYN OFFICE

Via Facsimile

The Honorable John Gleeson
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn New York 11201

Re: United States v. Ivan Moreno, 06 CR 425

s/John Gleeson

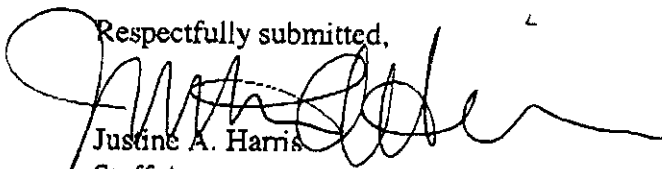
Your Honor:

My client, Ivan Moreno, is charged with possession with intent to distribute heroin. Mr. Moreno was released on a \$500,000 bond. He was arraigned on the indictment on Tuesday, July 11, 2006 and entered a not guilty plea. The first status conference is scheduled before Your Honor on July 27, 2006 at 3:30 p.m.

I am writing to respectfully request on behalf of my client and the government that Your Honor make the necessary findings and exclude the time between today, July 13, 2006 and July 27, 2006 under the Speedy Trial Act. Both parties are requesting the exclusion because we need time to discuss the possibility of a plea, without the risk that we would not subsequently have sufficient time to prepare for trial.

I appreciate the Court's consideration.

Respectfully submitted,


Justine A. Harris
Staff Attorney
(718) 407-7403

cc: AUSA Elizabeth Latif